

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

Simret Semere Tekle,

Plaintiff,

v.

**Nouf bint Nayef Abdul-Aziz Al Saud and
Mohammad bin Abdullah al Saud,**

Defendants.

Case No.: 1:18-cv-211 (TSE/JFA)

PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff respectfully moves the Court, by and through undersigned counsel, to enter a protective order relieving Plaintiff of the burden of responding to the 1,994 requests for admission propounded by the Defendants. For the Court's convenience, a proposed order is also provided.

Dated: May 6, 2019

Richard F. Levy (*pro hac vice*)
Andrew B. Cherry (*pro hac vice*)
Sati Harutyunyan (*pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue NW, Suite 900
Washington, DC 20001
(202) 639-6000
rlevy@jenner.com

Agnieszka M. Fryszman (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue NW, Fifth Floor

Respectfully submitted,

/s/
/s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg, VSB #77110
Nicholas Marritz, VSB #89795
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
(703) 720-5607
nicholas@justice4all.org

Washington, DC 20005
(202) 408-4600
afryszman@cohenmilstein.com

Le'ake Fesseha (*pro hac vice*)
LE'AKE FESSEHA LAW OFFICE
901 S. Highland Street, Suite 312
Arlington, VA 22204
(703) 302-3410
leakef@hotmail.com

Martina E. Vandenberg (*pro hac vice*)
Sarah L. Bessell (*pro hac vice*)
THE HUMAN TRAFFICKING LEGAL CENTER
1030 15th Street, NW #104B
Washington, DC 20005
(202)-716-8485
mvandenberg@htlegalcenter.org

Counsel for Plaintiff Simret Semere Tekle

CERTIFICATE OF SERVICE

I certify that I uploaded Plaintiff's Motion for a Protective Order to the Court's CM/ECF system today, which will cause a Notice of Electronic Filing and a link to the document to be sent to all counsel of record:

John Leslie Brownlee
john.brownlee@hklaw.com
Holland and Knight, LLP
800 17th Street N.W.
Suite 1100
Washington, DC 20006
202.955.3000

May 6, 2019

//s// Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg
VSB #77110
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
(703) 720-5605
simon@justice4all.org